

GROTON PLAN OF CONSERVATION AND DEVELOPMENT/ MUNICIPAL COASTAL PROGRAM UPDATE

PARKS, RECREATION AND OPEN SPACE

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Prepared for:
Town of Groton
Planning Commission

Prepared by:



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PARKS, RECREATION AND OPEN SPACE

The quality, quantity and variety of parks and open spaces are important characteristics of any community. Neighborhood parks and larger recreational facilities such as Poquonnock Plains Park and Sutton Park lend strength to Groton's residential neighborhoods, while open spaces add to the overall character of the Town. The benefits of parks and open space are multifold: they provide spaces for healthy activities and opportunities for social interaction, help preserve natural resources, enhance community character and positively affect property values.

The increasing focus on organized youth sports programs for recreation places demands on community facilities in many communities. The increasingly high participation in programs, extended seasons and specialized facilities are increasingly significant considerations for many communities in capital improvement planning. The need for spaces and/or facilities for informal recreational activities are also important to the overall health of a community. Recreation activity has evolved over the years to the point where organized sports and formal recreation programs are the focus of adolescent active recreation. In addition, providing opportunities for informal recreation activities (i.e. walking, jogging, hiking, biking) is also important to meet the growing needs of the community.

Open spaces are lands preserved primarily for conservation purposes but also support passive recreation uses. Recreation on open space lands is generally passive in nature, requiring little to no developed facilities. Open space preservation, in many instances, is a matter not only of maintaining ecological equilibrium but also of economic importance. As consistently demonstrated in the real estate market, people are willing to pay more money for a home in close proximity to parks and open space than a similar home that does not offer this amenity. Open space, if included as a major design component in community development, can help provide for the continuance of an intimate connection between the natural environment and the citizens of the community.

The establishment and preservation of greenbelts and greenways, in particular, has been a high priority objective for Groton in the past. Groton has been a leader in recognizing the importance of greenbelts in planning, first identifying and focusing on streambelts in 1961 and expanding this focus to "greenbreaks" in the community. Greenbelts refer to open space linkages that join open spaces into a cohesive whole greater than the equivalent amount of land separated into many small parcels. Greenbelts create connections that allow for corridors for trails and wildlife migration. When properly planned, greenways can link existing parks and open space areas with neighborhoods and community facilities, including schools, and provide an interconnected network serving Town residents.

The 2002 Groton POCD defines open space as land that is permanently preserved for or dedicated to open space uses. In the 2012 POCD open space can also include "perceived" open space that may not be permanently dedicated but contributes to the open space network and character of the community. Although perceived open space is included in this memorandum, it is not counted toward meeting the state's goal. The State of Connecticut has a goal to have 21% of all land in the State to be preserved for open space.

This memo summarizes Groton's parks, recreation and open spaces and reviews changes in the system that have occurred since the 2002 POCD.

DEFINITIONS AND CATEGORIES

The State of Connecticut defined open space land used for recreational and conservation purposes as land used for “agriculture, parks, natural areas, forests, camping, fishing, wetland preservation, wildlife habitat, reservoirs, hunting, golfing, boating, swimming, snowmobiling, historic and scenic preservation.”¹ It should be noted the State removed this definition from the statute and has not provided an alternative. **As this document is an update to the 2002 POCD, the existing classification definitions of open space for the inventory have been carried through and updated from the 2002 POCD.**

- Dedicated Open Space includes all land that is permanently preserved as open space. This includes land owned by the State of Connecticut, municipal organizations, and land trusts. It can also include land that is privately owned but set aside for open space as part of a development or other purpose.
- Managed Open Space includes land that is used or preserved for some purpose other than open space but that provides open space characteristics. In Groton, this includes land owned by the City of Groton Department of Utilities for water supply, cemeteries, golf courses, the YMCA property, and other areas such as beaches.
- Residual Land at Public Facilities includes some land on public facilities that is used for open space or recreation.

For the purpose of this memorandum, active recreational facilities are defined as areas that accommodate organized sporting activities such as baseball, basketball, soccer, or tennis. These facilities may also provide playscapes for younger children. For the purposes of this inventory, active recreational facilities have been further categorized by ownership as well as those associated with school facilities. Passive recreational facilities are areas that provide low impact recreation such as hiking or picnicking with minimal development or improvements. If improvements have been made they typically include little more than park benches or picnic areas. Some areas included in this inventory function as natural conservation areas and are generally left as natural, undeveloped open space.

In addition to those lands protected in perpetuity as open space, it is important to recognize lands and facilities that contribute to the overall fabric of Groton’s open space system. While PA 490 and Groton Utility lands may not be open to the public and may not be permanently protected, their presence affects the visual open space appearance of the community and their loss would represent an erosion of Groton’s community character.

PUBLIC UTILITY LANDS

Additional lands that are managed for natural resource preservation, but do not allow passive recreation contribute to the Town’s open space inventory. Groton Utilities owns significant acreage that is managed to protect its reservoirs. Since the City of Groton does not allow public access to these lands, these acres do not contribute to the passive recreation inventory, although they do contribute to the Town’s perceived amount of open space. Groton Utilities watershed lands equal approximately 1,400 acres.

The public utility lands of Groton fall under State Department of Health jurisdiction governing water supplies and pollution. No water company can sell, lease or dispose of watershed lands without a permit from the Commissioner of Public Health. Utility lands are divided into three classes based on proximity to reservoirs and level of protection afforded by the Department of Health. Text is taken from Connecticut State Statutes, Chapter 474, Section 25-32:

¹ CGS §7-131c

- Class I land: Directly impact the water quality of the reservoir and water courses that feed into the public supply. Class I is the most heavily protected, and cannot be sold or leased to other entities unless to another water company, state agency, or municipality. Conservation restrictions or public access easements on class I land can be sold or assigned to private, nonprofit land-holding conservation organizations if the land is to be maintained to state standards. Groton Public Utilities has 817 acres of Class I land, which includes the Town reservoirs.
- Class II land: (1) on a public drinking supply watershed which is not included in class I or (2) completely off a public drinking supply watershed and which is within one hundred and fifty feet of a distribution reservoir or a first-order stream tributary to a distribution reservoir.
Class II land may be sold or leased to another water company, municipality, or nonprofit land conservation organization provided that the land has a permanent conservation easement to preserve the land in perpetuity predominantly in its natural scenic and open condition. Groton Public Utilities has 448 acres of Class II land.
- Class III land: unimproved land off public drinking supply watersheds and beyond one hundred and fifty feet from a distribution reservoir or first-order stream tributary to a distribution reservoir. Class III land, not being essential to reservoir water quality, can be sold. Groton Public Utilities has 150 acres of Class III land.

Areas of each type of water utility land are broken out in the *Parks and Open Space Categories* table (in Appendix A) and illustrated on *Groton Public Utility Lands* map.

PUBLIC ACT 490 LANDS

In 1963 the Connecticut General Assembly passed what is commonly referred to as Public Act 490. The law states that is in the public interest to encourage the preservation of farm land, forest land and open space and prevent the conversion of these lands to more intensive uses as the result of economic pressures caused by assessments incompatible with current uses. The law and program allow qualifying parcels to receive favorable local property taxation based on current use, rather than market value.

Favorable tax assessments are gained differently depending on the type of land to be preserved:

- Farm land designation is obtained by written application (using an M-29 form) to the municipal assessor
- Forest land designation is obtained by written application (using an M-39 form) to the municipal assessor and must include a Qualified Forester's Report
- Open space land is designated only after it has been identified by the local planning commission in a plan of conservation and development and application is made to the municipal assessor (using an M-30 form)

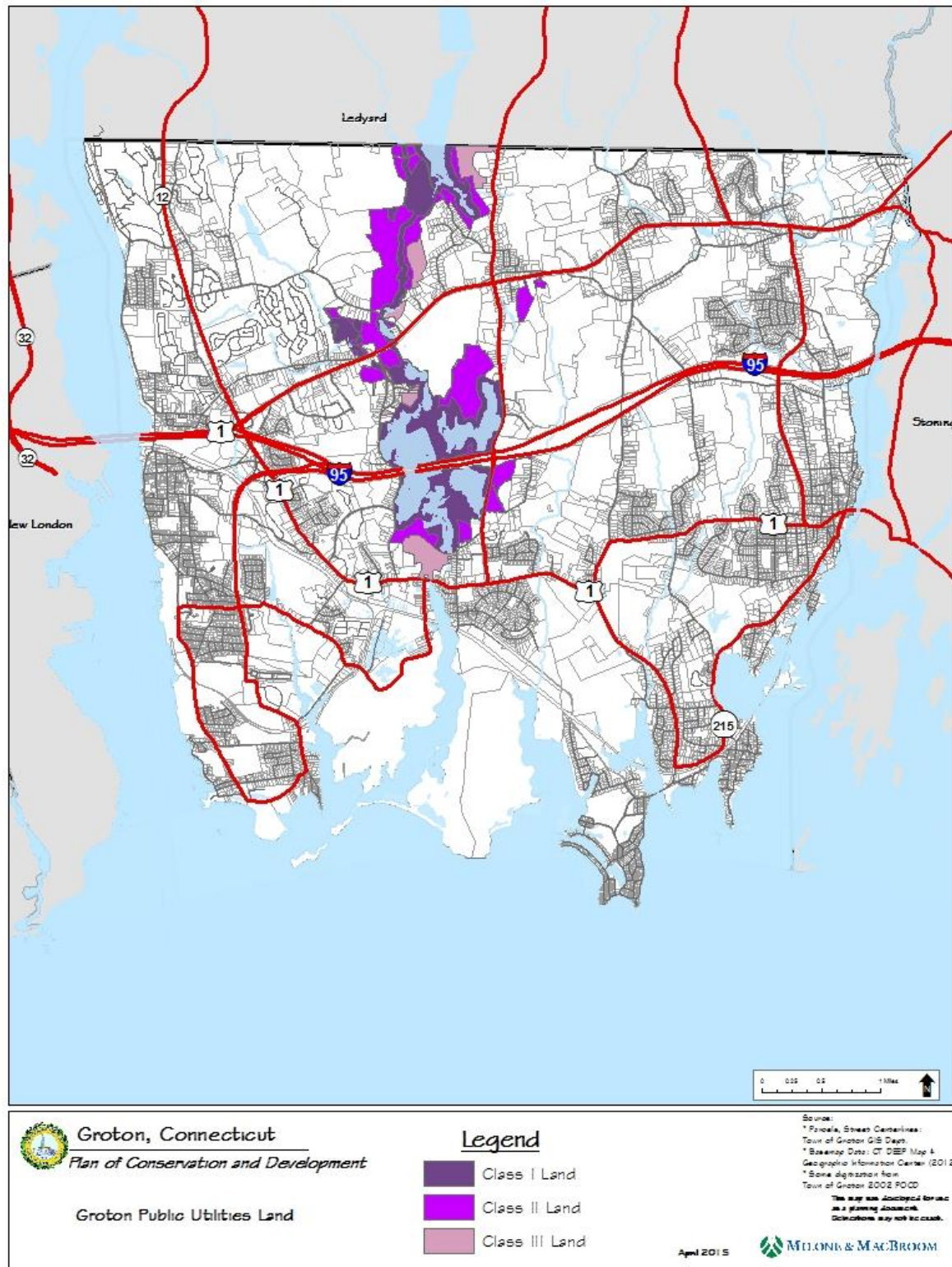
In all cases, the value of land designated under Public Act 490 is decreased to reflect current usage, thereby lessening the property tax burden on the owner. The conveyance tax amendment imposes a percentage fine on Public Act 490 lands whose use has changed. The conveyance tax is based on the number of years the land is classified under Public Act 490 and the total sales price at the time of conversion. After ten years under Public Act 490 designation, a property is no longer subject to this conveyance tax.

In Groton, 36 parcels have Public Act 490 farm land designation, totaling 689.9 acres. An additional 1,418.6 acres spread over 38 parcels have been designated Public Act 490 forest land. These properties are shown on the *Existing Public Act 490 Lands* map.

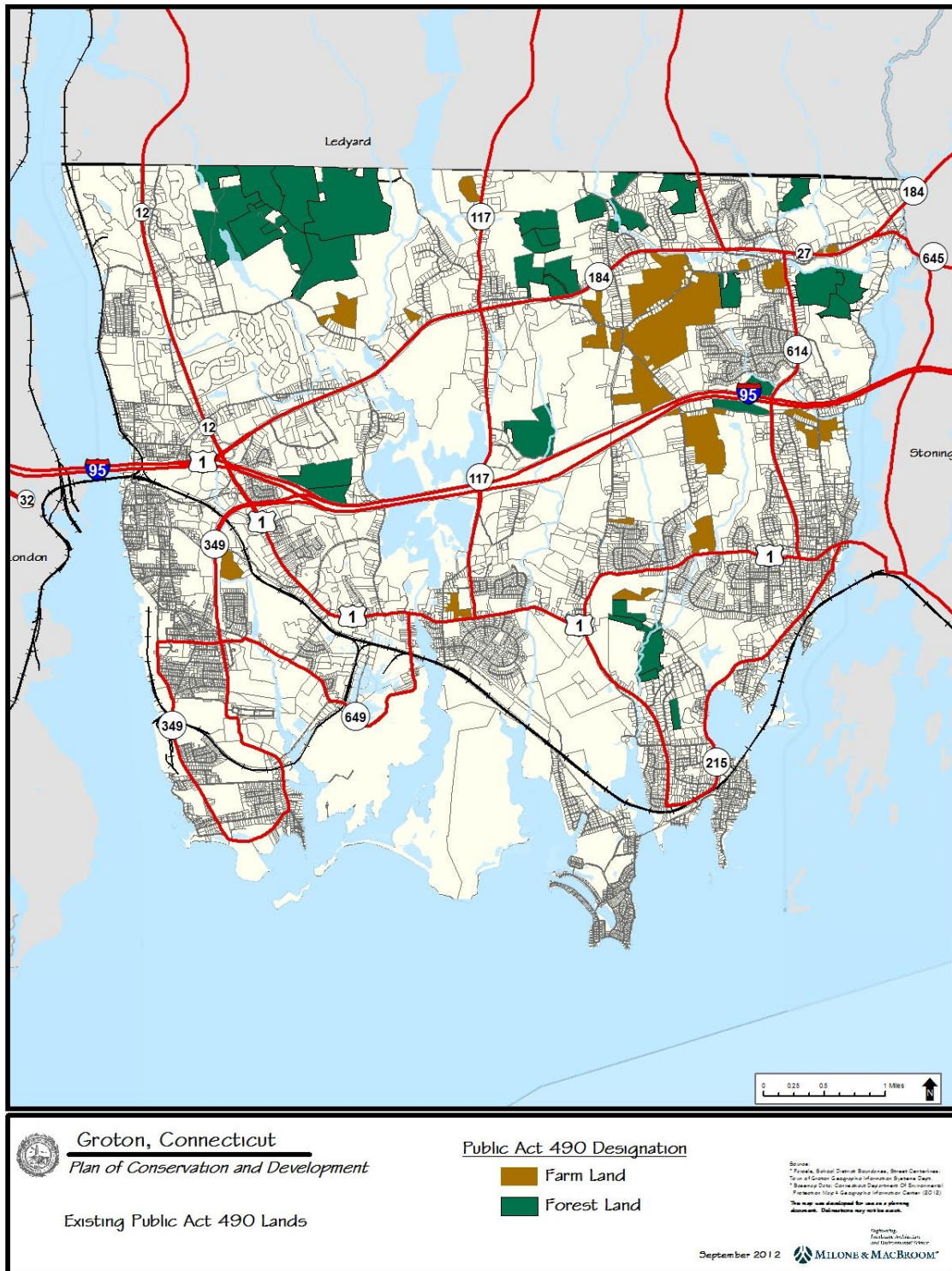
While the Public Act 490 program does not guarantee that this land will remain as open space because owners maintain the right to sell, it does provide incentive to preserve working farm land and forests. These lands are inventoried separately from other open space because they are privately owned, do not necessarily provide public access and may be converted to a different use. However, these parcels contribute to the overall open space

network, the protection of Groton's natural resources and the character of the community. These lands may be considered as candidates for more permanent forms of protection in the future.

Map 1



Map 2



2002 RECOMMENDATIONS

An appropriate beginning to a discussion of parks, recreation and open space is to review the recommendations made in the 2002 POCD. The following table presents the 2002 POCD Open Space and Recreation recommendations. A general observation of the recommendations is that many are operational or on-going in nature and the Steering Committee should discuss the appropriateness of these types of recommendations for inclusion in the updated POCD.

Table 1

High Priority 2002 POCD Open Space and Recreation Recommendations	Priority
Establish Greenbelts	
Develop an action plan to establish, expand, and connect greenbelts.	High
Establish A Trail System	
Work with Groton Utilities to obtain public access to their properties.	High
Work with major property owners to create an overall trail network.	Moderate
Require identification and consideration of trails as part of land use applications.	Moderate
Implement The Open Space Plan	
Establish an open space acquisition fund funded annually in the budget.	High*
Amend regulations to allow payment of fees-in-lieu of open space dedication.	High*
Consider amending regulations to require a greater percentage of land be preserved.	Moderate
Develop an open space management plan for existing open space and future uses.	Moderate
Amend regulations to allow donation of open space land elsewhere in Groton.	Lower*
Recreation Needs Strategies	
Provide additional recreational facilities to meet local needs	
Continue to coordinate recreation facility usage with the schools to meet needs	
Explore the possibility of cooperation with other recreation facilities in Groton.	
Consider developing a recreation center with pool, gym, fitness, and youth areas.	
<i>*Completed</i>	

OTHER PLAN RECOMMENDATIONS

In recognition of the changing needs of Groton, a comprehensive Parks and Recreation Master Plan for the Town of Groton was completed in 2009 and components are incorporated into this Plan of Conservation and Development update. The Parks and Recreation Master Plan included an extensive community survey and outreach process to gauge existing facilities and programming strengths, weaknesses, opportunities and threats, establish goals for the department and community, and identify gaps in service. In addition, the Plan included an extensive action agenda designed to move the Groton Parks and Recreation Department closer to its goals.

As documented in the Demographic Memorandum, Groton's demographic portrait continued to experience change during the past 10 years. As a result of potential changes that may occur relative to age and population composition, the need for recreational facilities, activities, and services has continued to evolve for individual neighborhoods and the Town as a whole. One of the key components of the 2009 Master Plan is to attempt to bring existing facilities into concert with these evolving recreation needs and changing demographics of the community. Shown on the following pages are level of service analyses for indoor, outdoor, and trail facilities from the 2009 Master Plan.

As reported in the 2009 Master Plan, Federal, State and privately owned and maintained facilities complete the variety of parks and recreation facilities available to Groton residents. This wide variety of facilities in conjunction with the Town's numerous parks and school parks helped the Town achieve a better than average overall "level of service."

The National Recreation and Park Association (NRPA) developed standards to serve as basic guidance for communities in determining whether they offer adequate recreational amenities to residents. Using these basic guidelines, the 2009 Parks and Recreation Master Plan conducted a level of service analysis that factored in community and staff feedback, facilities inventories and assessments, and spatial analysis. The level of service analysis focused on active recreation facilities to determine gaps in service and facilities. Overall, the Town is above recommended levels of service on an acreage per 1,000 population basis. However, the level of service for small pocket or mini parks is below the NRPA's recommended levels. Groton is within or above recommended levels of service for neighborhood and community parks.

The analysis concluded that additional acreage is not necessary to improve levels of service; rather, the development of programmed space such as athletic fields, courts and playgrounds on already owned parcels would suffice. However, the study acknowledged that there is a balance that needs to be struck between preserving passive recreation areas and the development of more programmed recreation facilities.

The maps on the following pages highlight the results of the level of service analysis.

The 2009 Parks Master Plan established the following broad goals for the Department and community:

- Evaluate the resource needs of the Department. Identify the tools, funding, and staffing levels necessary for employees to do their jobs effectively and provide a high level of service to the community.
- Address current facility challenges and impacts on services. The Department is highly dependent on athletic fields and indoor facilities that are not under Town ownership, which leaves the Department

vulnerable to uncontrollable circumstances which can greatly impact the provision of core services and the associated revenue.

- Identify the prioritized community needs for facility improvements and development. These needs should provide details on the Town's gap in services, the types of facilities and amenities needed, as well as the resources needed to operate and maintain these facilities.
- Create a plan that is realistic, identifies priorities and provides an action plan to implement it.
- Engage the community, elected officials and partners in order to gain buy-in and support.

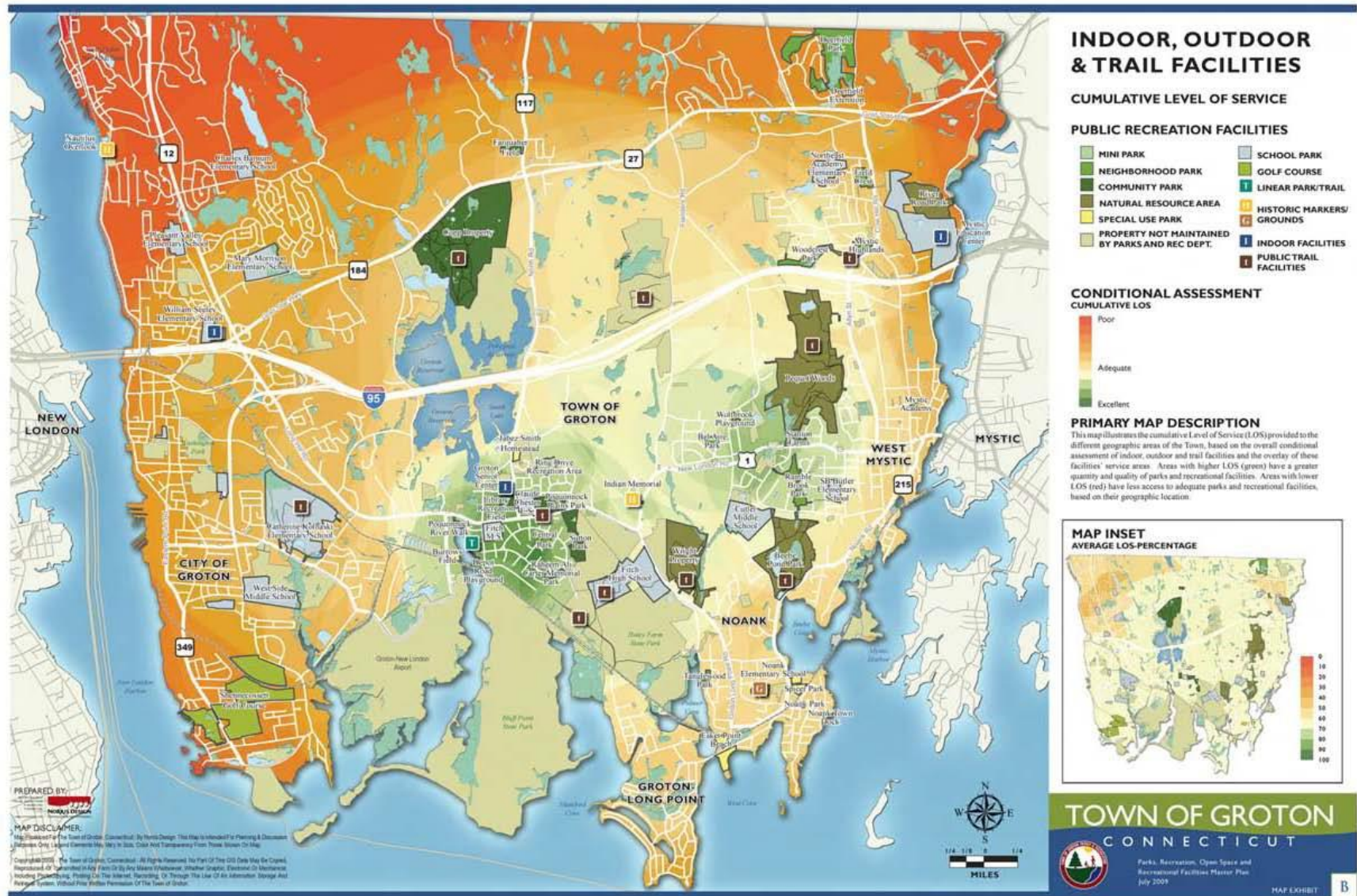
Groton also commissioned a Groton Bicycle, Pedestrian & Trails Master Plan in 2005 to assess existing trails conditions and formulate recommendations on future trail improvements to promote convenient alternatives to driving. Need for a Trails Master Plan was realized after an attempt to fund a proposed trail along Route 117 failed due to lack of a comprehensive trail plan. The Trails Master Plan proposed a network of trails, sidewalks, and bikeways, including a list of priority projects and potential funding sources.

General recommendations include:

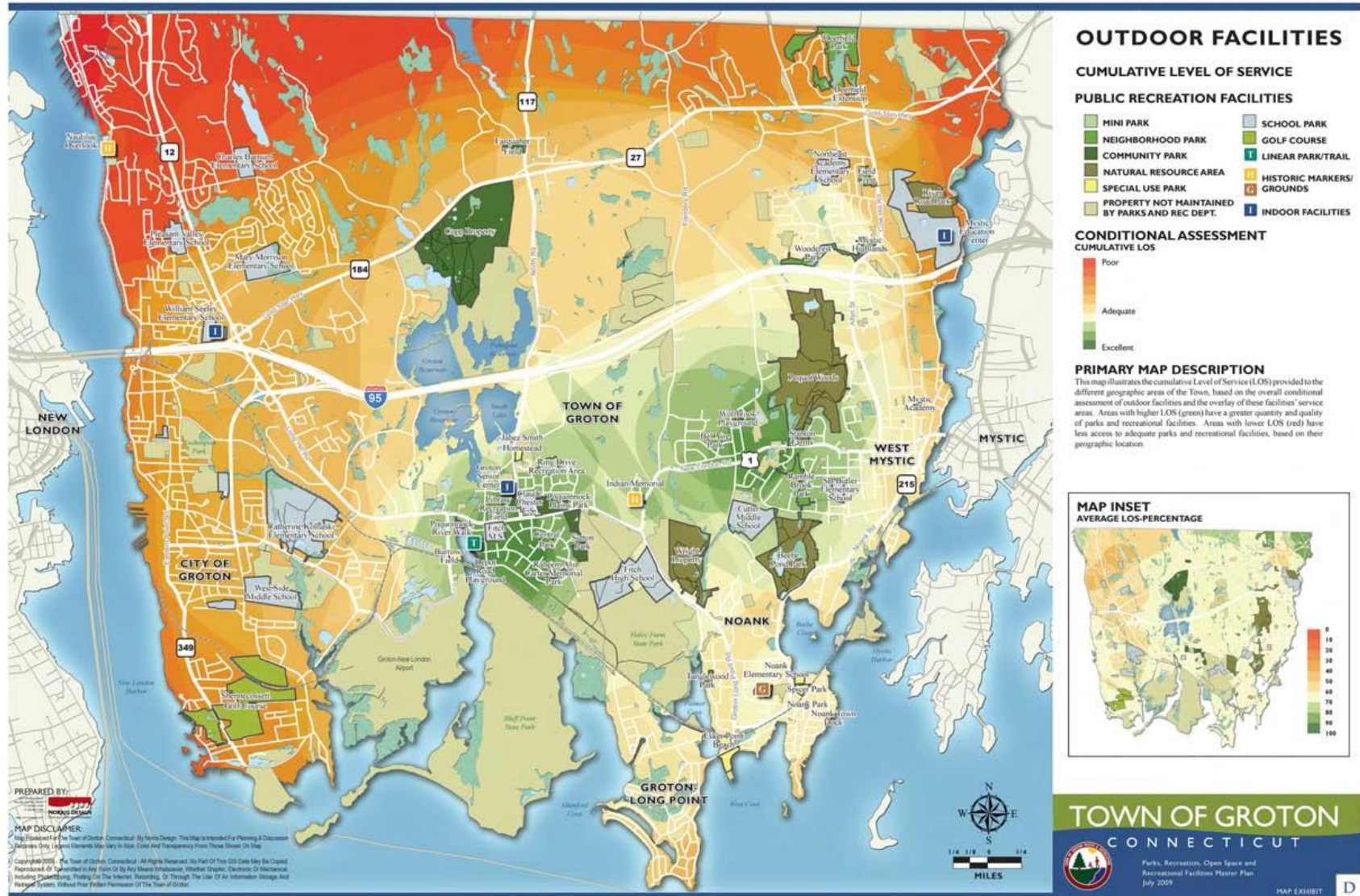
- On-street bike route improvements such as awareness and directional signage, alternative road striping and widening to create more space for bikes, and spot improvements for specific issues such as pothole patching.
- Sidewalks additions including placement of new sidewalks to infill existing gaps with need, service potential future developments, and connecting schools to surrounding neighborhoods. Sidewalk improvements include safety improvements at crosswalks with signage, crossing signals, handicap curb ramps, traffic calming, and spot improvements.
- Trail development and improvements, such as access points with signage; safety measures at road crossings; bridges or boardwalks over rivers and wet areas; interpretive, directional, and regulatory signage; rest areas; and specialized trails.

Community survey respondents listed commuter routes as the greatest need in Groton. These primary bike routes would include a route from Groton City to Poquonnock Bridge to Mystic; Old Mystic to Center Groton to Gold Star Bridge; and Poquonnock Bridge to Groton Long Point to Noank to Mystic. Primary pedestrian routes would include sidewalks and trails from all public schools to/through surrounding neighborhoods, as well as connecting sections along US Route 1. See the *Bicycle, Pedestrian, & Trails Master Plan* map for more information.

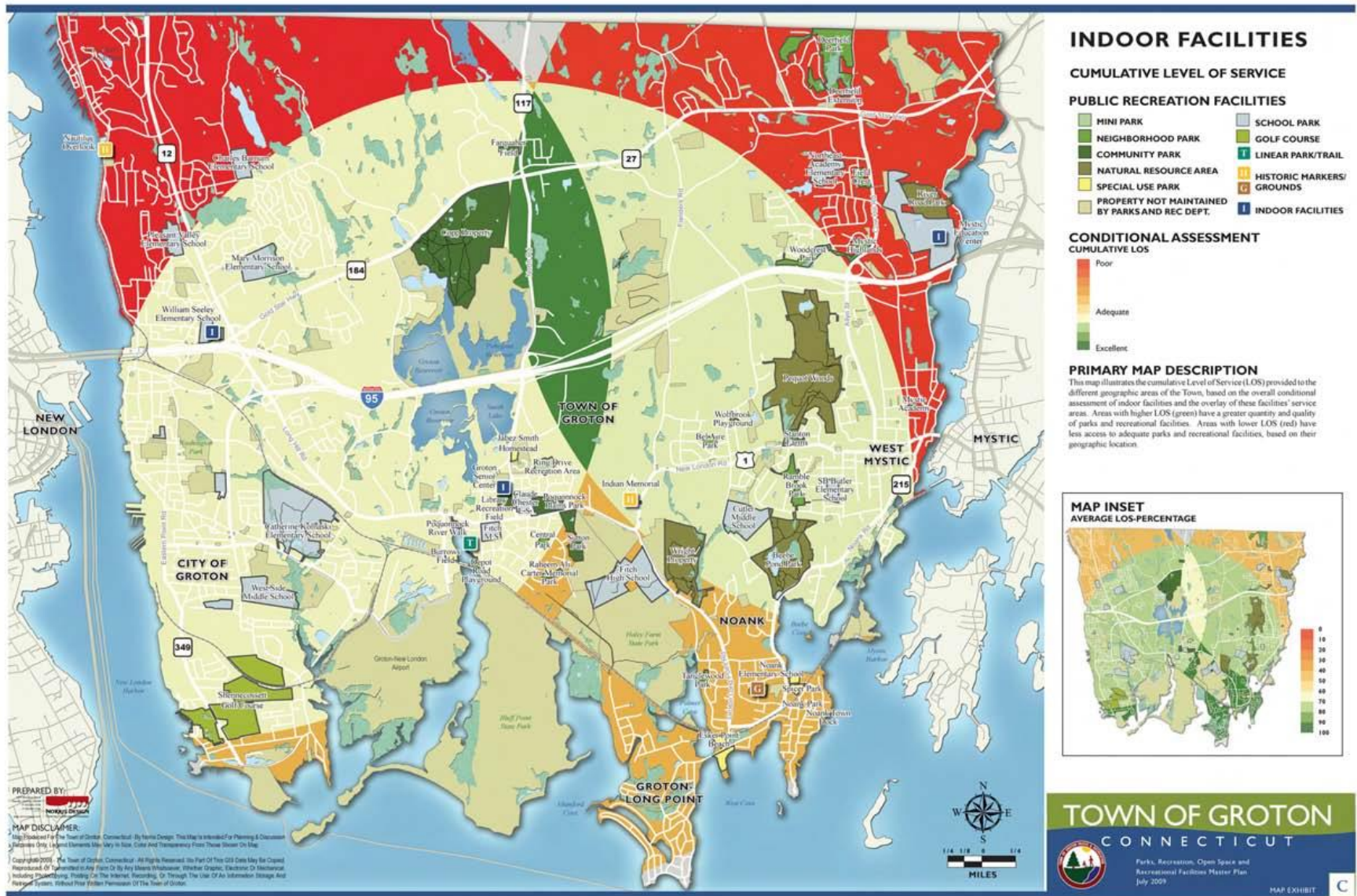
Map 3



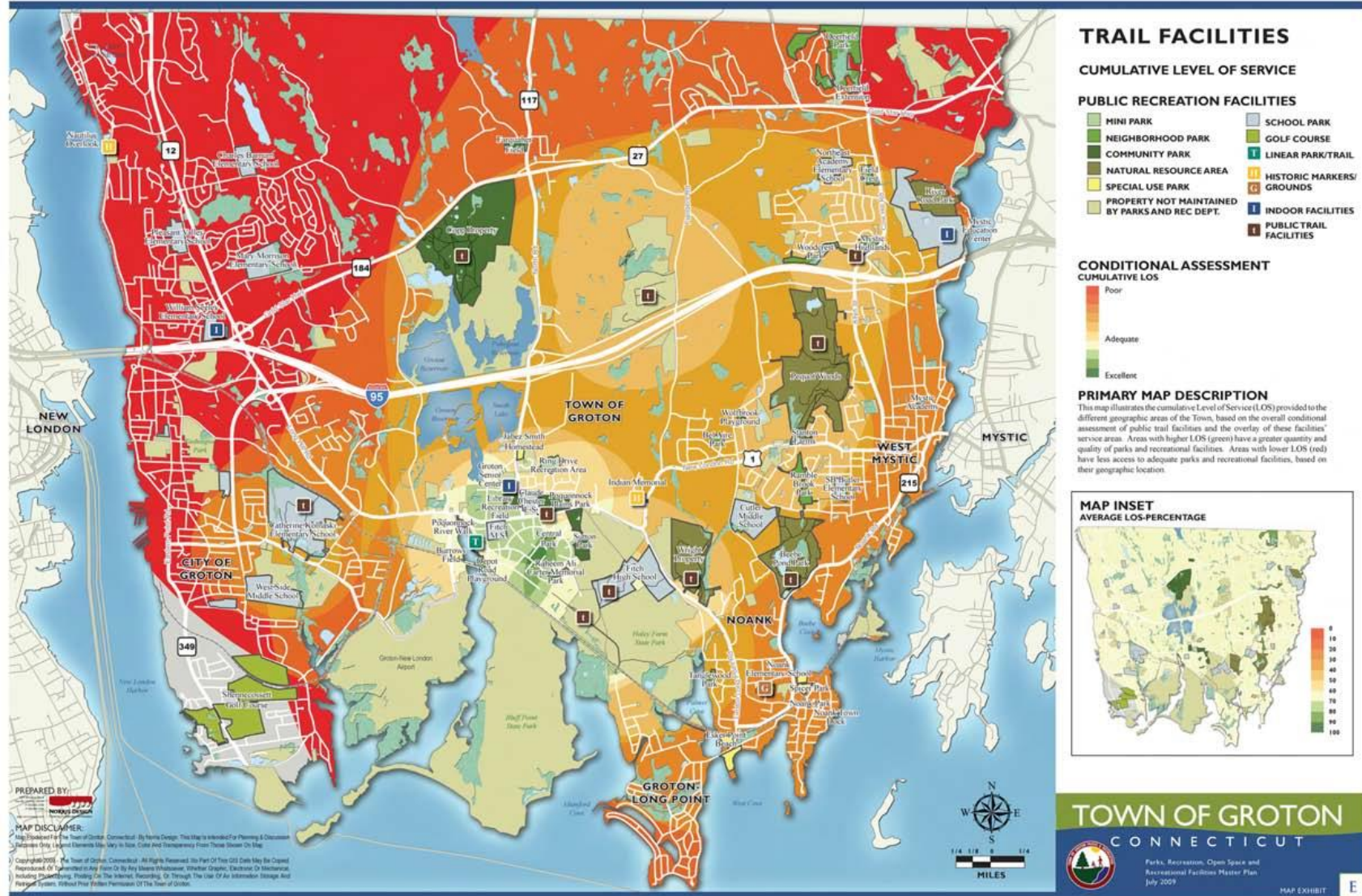
Map 4



Map 5



Map 6



IMPLEMENTATION SINCE 2002

Key Parcels Acquired

The 2002 POCD created a Possible Future Open Space Plan that highlighted parcels and linkages that could contribute to expanding open space in Groton. These included desirable parcels to be acquired by public entities as well as parcels to target for preservation through land trusts, conservation easements, and conservation developments. The following *What Has Changed* map shows the 2002 POCD Possible Future Open Space Plan overlaid with open space changes since 2002. While some parcels suggested for acquisition have become open space (as well as many parcels not originally suggested), some of the parcels have become developed. However, many have not changed from the 2002 land use and may still be future open space investments.

Private, non-profit organizations that acquire land for recreation or conservation may work cooperatively with the Town by sharing costs and maintenance of the property. Land trusts often enter the real estate market more quickly and easily than government agencies. The most prominent land trust group in Groton is the Groton Open Space Association, Inc. GOSA was founded in 1967, and has worked to preserve many open space areas, including Haley Farm State Park, The Merritt Family Forest, The Sheep Farm, and as of June 11, 2013 acquired the 91-acre Candlewood Ridge site for preservation. The Town of Groton recently made a notable purchase of 30 acres of open space land known as the Spicer properties for open space preservation as well. See the *What Has Changed* map for parcel acquisition updates since 2002. Also it should be recognized that significant acreage of open space has been acquired through the subdivision approval process.

Programs Initiated

One of the notable changes since the 2009 Master Plan relates to the Town aquatics program. The Parks and Recreation Department has changed its aquatics program venue from the Mystic Education Center, which the State is in the process of divesting itself of, to the Avery Point campus of UCONN. The lack of adequate aquatic facilities continues to be a gap in facilities.

Facilities Constructed

Since the 2002 POCD, the Town of Groton has added a new dog park, accessible features at the Tercentennial Legacy Playground at Poquonnock Plains Park, and the Lilly Lane multi-purpose recreational trail; made improvements to the Fitch baseball field; expanded the Senior Center and proposed a new Thomas Road Bikeway.

The Capital Improvement Plan (CIP) is a long-term planning and policy document that includes capital projects for the next five fiscal years. According to the 2013 budget, the following programs are planned to receive funds of \$5,835,000 over the next five years.

Facilities improvements over the next five years are estimated at \$4,625,000. This includes:

- Resurfacing two basketball courts and two tennis courts at Farquar Park in 2013
- Planning/engineering and design of additional athletic fields on the Merritt Property in 2013
- \$4,000,000 in funds for improvements to Sutton Park in 2015
- An update to the Master Plan for the Copp Property in 2016
- Additional athletic fields in 2017
- Development of a Master Plan for Esker Point Beach and anticipated construction costs in 2018

The Trail Improvement Program over the next five years is estimated at \$655,000. This includes:

- Request for funding for the second phase of the Groton portion of the Tri-Town Trail Project in 2013
- Construction of a wooden foot bridge for Beebe Pond in 2014
- The identification of permitting constraints, rights of way, and opportunities for creating bike and walking amenities for the East/West Bikeway in 2014
- Construction of the southern section of the Tri-Town Trail in 2014
- Construction of the final phase of the G&S Trolley Trail in 2015
- Additional trail projects for years 2016-2018

Open Space Acquisition and Development requested funds of \$25,000 a year from 2013 to 2018 to investigate potential open space acquisitions, fund negotiations, and provide matching funds for open space acquisition.

The Golf Course Improvement Plan requested \$275,000 over the next five years to rebuild bunker complexes and build new tee complexes.

The Park Improvement Plan requested \$155,000 over the next five years to assess and update existing facilities and play structures to new ADA standards.

Recommendations Implemented



Esker Point Beach

Since 2009, the Parks and Recreation Commission and Department have implemented several recommended strategies, including:

- Purchasing and implementing a new software program to improve efficiency and service delivery
 - Working to identify an appropriate location and composition of a community center and/or aquatics facility
 - Establishing a new relationship with the UCONN Avery Point campus for use of their aquatics facilities, as the State seeks a private party to take over the Mystic Education Center
 - Increasing on-line promotion and marketing efforts, including the development of an on-line, interactive coastal site access map
- Making improvements to the crossing of Groton Long Point Road near Esker Point Beach have been made

COMPARISON TO REGION AND STATE GOALS

The State of Connecticut has a stated goal of preserving 21% of Connecticut's land as open space by the year 2023. This open space goal is broken down by 10% to be state-owned additions, and 11% owned by municipalities, private nonprofit land conservation organizations, water companies, and the federal government. As published on the Department of Energy & Environmental Protection's website, the state has achieved 73% of this goal as of October 2010.

In the Town of Groton, roughly 14% of land is currently preserved as dedicated open space. State-owned dedicated open space (such as Bluff Point State Park) total 1,236 acres, or 6% of the total land area of Groton. Municipal and Private Land Trust dedicated open space totals 1,700 acres, or about 8% of the total land area in Groton. If Groton Utility lands are included (1,400 acres), the total non-state open space total becomes 13% of total land area, exceeding the 11% state goal for local share of open space.

SUMMARY

The Town of Groton is fortunate to have an existing park and open space system that is in relatively good condition, well distributed geographically, and diverse in the types of uses accommodated. Maintaining parks and open spaces that are adequate in extent, strategic in location and equitable in distribution is important for meeting the unique active and passive needs of the Town's population. The future of existing parks and open space will depend in part on the efficient use of the existing facilities, the maintenance and rehabilitation of facilities requiring improvements and the potential development of new facilities.

The Town has reached a point in its open space program where it would benefit from formalizing an open space goal or philosophy to guide its open space theme. Consideration should be given to the appropriateness of continuing to emphasize open space acquisition or should focus shift to upgrading amenities at existing facilities as suggested in the Parks Master Plan and to the degree of emphasis to be placed on assembling linkages between existing parks and open space resources.

Typical component of the open space plan may involve identifying locations within the community on which to focus future open space protection efforts. In order to become proactive in implementing such a policy, it is necessary to develop criteria from which to identify whether a site that becomes available for acquisition possesses unique characteristics that will enhance the Town's overall open space network or will provide a significant benefit to residents. The following is a list of objectives that may help guide open space protection efforts:

- Links existing parks and open spaces together to form interconnected greenways within the community or on a larger regional open space network
- Adjacent to and complementary to existing parks and/or open space owned by the Town of Groton, neighboring municipalities, the State of Connecticut or a private entity
- Preserves natural drainage areas including waterways and surrounding wetlands and floodplains
- Protects existing and potential public drinking water supplies, including groundwater supplies
- Protects unique and significant natural features including critical or threatened habitats
- Preserves agricultural land
- Preserves and protects ridgelines
- Has multiple recreational or open space values (i.e., can be used for several different passive and/or active recreational uses).

A municipal open space planning publication has outlined factors that a community should consider in order to maximize its funding opportunities. These include the following:

- Invest resources to develop a natural resource inventory and assemble key parcel data for priority sites.
- Work with neighboring municipalities to advance joint preservation projects.
- Develop a clear and accurate map that shows public and private protected open space, and proposed open space acquisition areas and corridors. Include the map with any funding applications.
- Study the goals of the potential funding organizations and assess which goals align with those of the community. Also, identify specific sites or areas that may meet a particular organization's goals. For example, the Connecticut Department of Environmental Protection considers, among other factors, whether a parcel is: significant in size, regionally accessible, contiguous to other state holdings, unprotected by regulation or adjacent to water.

- Creatively integrate volunteer, corporate and non-profit assistance to advance open space protection goals and objectives.

The information presented in this memorandum is intended to present the information necessary to begin discussion of the above items.

APPENDIX

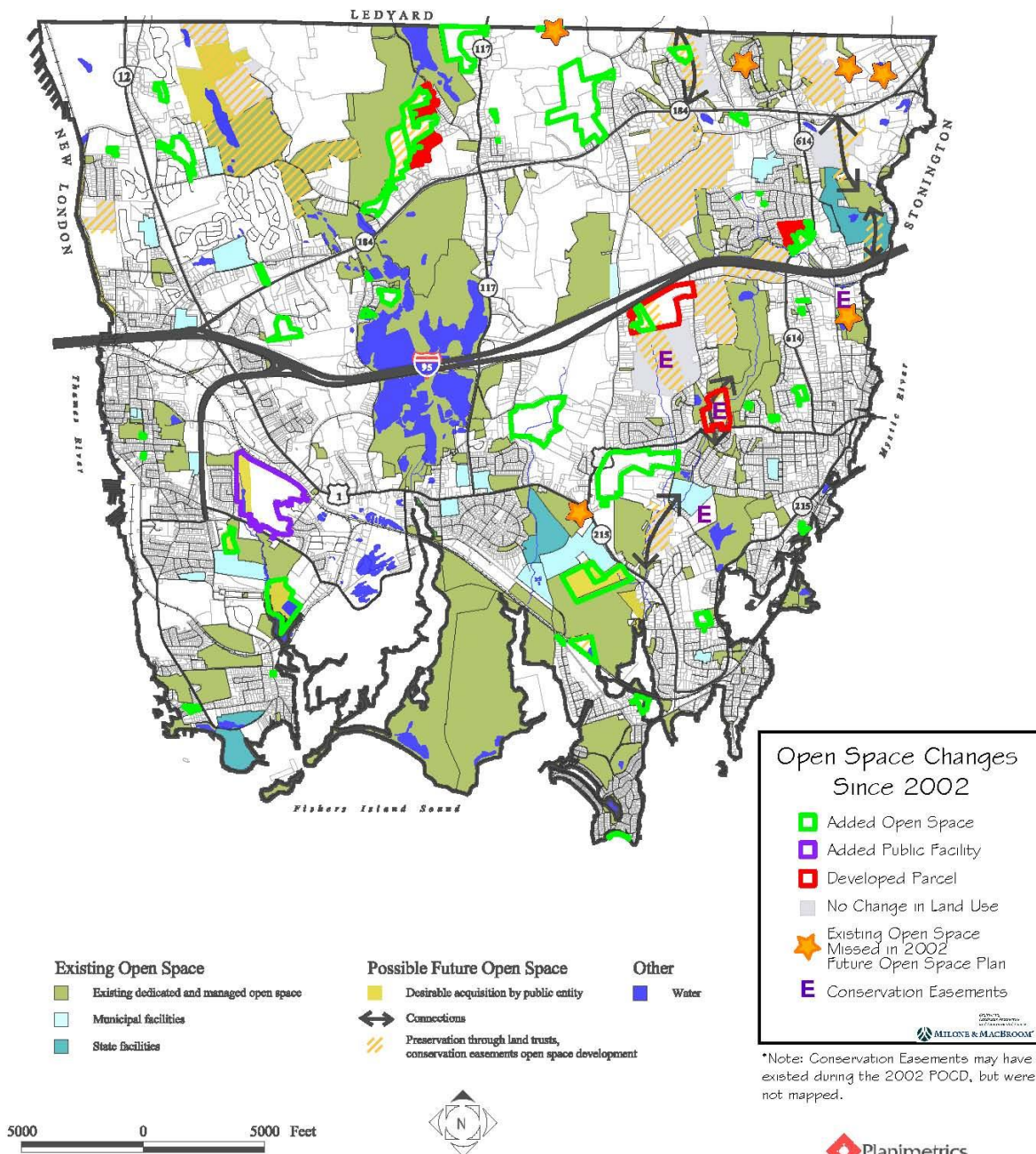
Appendix Map 1

What Has Changed:

Desired Parcel Preservation and Development Since 2002 POCD

Possible Future Open Space Plan (2002 POCD)

Town of Groton, CT



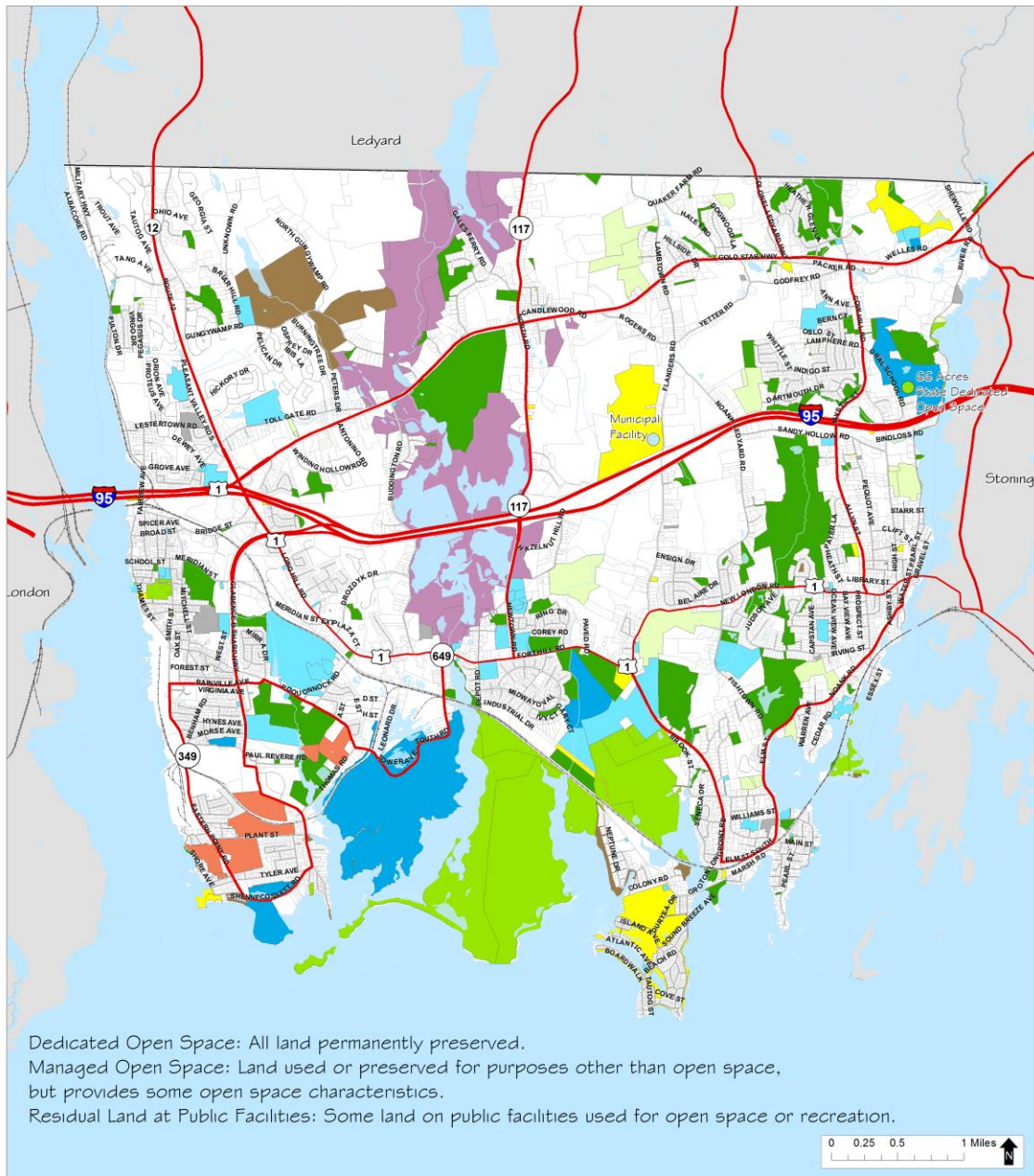
Appendix Table 1

Parks and Open Space Categories	2012 POCD			2002 POCD			Change
	Total Area in Acres	Facilities (est.)	Open Space	Total Area in Acres	Facilities (est.)	Open Space	in Open Space
Dedicated Open Space	2,895.3	0.0	2,895.3	2,311	0	2,311	584.3
<i>Municipal Dedicated Open Space</i>	1,346.9			1,198			
<i>State Dedicated Open Space</i>	1,194.8			1,020			
<i>Private Land Trust Dedicated Open Space</i>	353.5			93			
Managed Open Space	2,310.0	234.4	2,075.6	2,075	197	1,878	197.6
<i>Public Managed Open Space</i>	392.4			302			
<i>Private Managed Open Space</i>	282.4			258			
<i>Groton Utilities Land</i>	1,400.8			1,318			
<i>Class 1 Utility Land</i>	817.2						
<i>Class 2 Utility Land</i>	448.8						
<i>Class 3 Utility Land</i>	134.8						
<i>Cemeteries</i>	63.0	63.0		63	63		
<i>Golf Courses</i>	171.4	171.4		134	134		
Facilities*	1,279.4	127.1	509.1	578	237	341	168.1
<i>Municipal Facilities</i>	594.0			336	164		
<i>Schools</i>	391.3	64.8					
<i>Parks /Open Space at Schools</i>	326.5		326.5				
<i>State Facilities</i>	685.4	62.3		242	73		
<i>**Parks/Open Space at State Schools</i>	182.6		182.6				
Total Parks and Open Space	6,484.7	361.5	5,479.9	4,964	434	4,530	949.9

2002 POCD info from 2002 Groton POCD Workbook, Booklet #11 p.1 and 2

*Other Facilities included in this section are the Senior Center, Town Hall Annex, Police and Fire services, libraries, and Dept. of Public Works.

** UConn Avery Point, Ella T. Grasso Technical HS, and Mystic Oral School





Groton, Connecticut
Plan of Conservation and Development

Existing Parks, Recreation, and Open Space Facilities

- Municipal Facilities
- State Facilities

Open Space by Type

Managed Open Space

- Public Managed Open Space
- Private Managed Open Space
- Groton Utilities Land
- Cemetery
- Golf Course

Dedicated Open Space

- Municipal Dedicated Open Space
- State Dedicated Open Space
- Private Land Trust Dedicated Open Space

August 2013

Source:
 * Parcels, Street Centerlines:
 Town of Groton GIS Dept.
 * Base Map Data: CT DEEP Map 4
 Geographic Information Center (2012)
 * Some digitization from:
 Town of Groton 2002 POCD

This map was developed for use as a planning document. Delineations may not be exact.

